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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROBERT CRAGO, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiff,

vs.

CHARLES SCHWAB & CO., INC., and THE
CHARLES SCHWAB CORPORATION,

Defendants.

Case No.: 3:16-cv-3938-RS

CLASS ACTION

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF CLASS
CERTIFICATION SCHEDULE AS
MODIFIED BY THE COURT**

1 Pursuant to Local Rule 6-2, Lead Plaintiffs Robert Wolfson and Frank Pino and named
2 plaintiff Scott Posson (“Plaintiffs”), and Defendants Charles Schwab & Co., Inc. and The Charles
3 Schwab Corporation (“Defendants” or “Schwab” and, together with Plaintiffs, the “Parties”), by and
4 through their respective counsel, for good cause, hereby stipulate as follows:

5 WHEREAS, on April 15, 2019, the Court entered a Case Management Scheduling Order
6 setting the case schedule through the class certification hearing (ECF No. 144), and on June 23, 2020
7 the Court so-ordered the Parties’ stipulation to extend the case schedule (ECF No. 154);

8 WHEREAS, the Parties have engaged in class certification and merits discovery and are
9 continuing to meet and confer in good faith regarding outstanding issues;

10 WHEREAS, pre-class certification fact depositions have been completed;

11 WHEREAS, Plaintiffs produced expert disclosures and a report concerning class certification
12 on September 1, 2020, but production of certain backup expert materials was delayed;

13 WHEREAS, Defendants require additional time to review and respond to the complete set of
14 Plaintiffs’ expert disclosures, report and backup materials;

15 WHEREAS, the Parties have agreed, with the Court’s approval, to modify the Case
16 Management Scheduling Order to extend the deadlines for approximately thirty days (30) through the
17 class certification hearing;

18 WHEREAS, this is the Parties’ sixth request for an extension of the deadlines in the Case
19 Management Scheduling Order;

20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO
21 APPROVAL BY THIS COURT, as follows:

22 The deadlines through the class certification hearing shall be as follows:
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Event	Deadline
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	December 7, 2020
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	January 25, 2021
Expert depositions concerning class certification	February 3-12, 2021
Plaintiffs' class certification motion and <i>Daubert</i> challenges	March 17, 2021
Defendants' class certification opposition, <i>Daubert</i> challenges, and <i>Daubert</i> opposition	May 18, 2021
Plaintiffs' reply brief, opposition to <i>Daubert</i> challenges, and reply to <i>Daubert</i> challenges of Defendants' expert(s)	June 7, 2021
Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	July 1, 2021
Class Certification Hearing	July 22, 2021

IT IS SO STIPULATED.

Dated: November 4, 2020.

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Dated: November 4, 2020.

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ATTESTATION

I, Gilbert R. Serota, am the ECF User whose identification and password are being used to file this Proposed Order for Extension of Class Certification Schedule. In compliance with Local Rule 5-1(i)(3), I hereby attest that Counsel for Plaintiffs concur in this filing.

Dated: November 4, 2020.

/s/ Gilbert R. Serota
GILBERT R. SEROTA

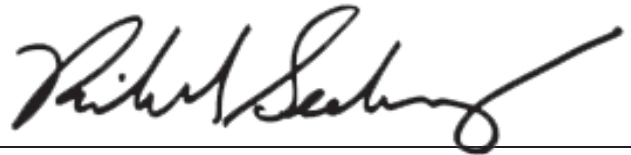
[PROPOSED] ORDER

Based on the Parties' stipulation and the good cause described therein, the Court GRANTS this stipulation. The following schedule shall apply:

Event	Deadline
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	December 7, 2020
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	January 25, 2021
Expert depositions concerning class certification	February 3-12, 2021
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Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	July 1, 2021
Class Certification Hearing	July 22, 2021

IT IS SO ORDERED.

DATED: November 5, 2020



The Honorable Richard Seeborg
United States District Judge